



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

January 23 , 1995

Mr. Samuel Borries
On-Scene Coordinator
United States Environmental Protection Agency
Region V Offices
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Mail Code - HSE-5J

RE: L1631210001 - St. Clair County
Sauget Area 2 Sites - Site Q
ILD 000605790
Superfund/Tech

Dear Mr. Borries:

As per your request, I am submitting a list of state of Illinois ARARs governing the planned removal action at Site Q in Sauget, Illinois.

The Removal Action Memorandum has been reviewed by the Illinois EPA's Bureau of Land's Permit Section and the reviewer's comments are enclosed in this transmittal. Please be informed that the permit section has noted that there are no special standards for storing non-hazardous special waste on-site that has been generated by removal efforts.

Also, please be advised that if non-hazardous special wastes are stored on-site for one year, it is then regulated as a landfill under Title 35, Illinois Administrative Code 811.

Information concerning the removal effort has also been forwarded to the Illinois Department of Conservation, Illinois Department of Transportation, and the Hazardous Waste Research and Information Center. I am awaiting their comments.

If you have any questions or comments concerning this transmittal, please do not hesitate to call me at 217/524-1654.

Sincerely,

A handwritten signature in cursive script, reading "Kimberlee A. Hubbert", followed by a horizontal line.

Kimberlee A. Hubbert
Environmental Protection Specialist
Site Assessment Unit
Remedial Project Management Section
Bureau of Land

Attachments

cc: Paul Takacs, RPMS (w/attachments)
Rob Watson, Permit Section (w/attachments)
Collinsville Region (w/attachments)
Division File (w/attachments)

PERMIT SECTION COMMENTS

Comments on Removal Action Report for Sauget Area 2: Site Q

1. The report contains a limited description of the wastes and a general description of the proposed removal actions at the site. Therefore, the Permit Section does not have "specific" comments on ARARs for the removal action at this time.
2. The report should include a description of the ARARs for the proposed removal actions at the site. The Agency will review and comment on the ARARs that are described in the report.
3. The report does not identify the regulatory classification(s) of the contaminated media that will be managed at the site. The regulatory classification of the materials and the wastes at the site must be known in order to accurately identify the ARARs for any proposed removal action. Regulatory classifications at a site can include RCRA hazardous wastes, Illinois Special Wastes, TSCA wastes such as PCBs, and Class I, II, III, or IV groundwater.
4. Only three drums were sampled, but the removal action assumes that up to 50 drums and 20 cubic yards of material may be removed. If the waste classification of the additional drums is different from the three that were sampled, the ARARs could be different. The nature and extent (including the regulatory classifications) of the material which will be involved in the removal action need to be defined in much greater detail in order to determine the ARARs, choose off-site disposal facilities, and safely handle the wastes.
5. If the waste classifications of the wastes in the drums will not be known until they are removed from the landfill, they should be managed as if they are both TSCA and RCRA regulated wastes until the analytical results are known. The following standards should be met, at a minimum:
 - a. The drums and soils removed from the landfill should be stored in tanks or containers and managed in accordance with the requirements of 35 IAC 722.134.
 - b. If the wastes are hazardous, and time limits for storage are exceeded, the area would have to go through RCRA closure.
 - c. If wastes collected at the site are determined to be hazardous and placed in a pile, the RCRA regulations would be applicable to that unit. This could require a Part B permit, and/or RCRA closure.
6. The Special Waste Hauling regulations at 35 IAC Part 809 would apply for any wastes shipped off-site.

LISTED ARARS FOR THE SAUGET SITE Q REMOVAL ACTION

One-tenth of the 96-hr. Medial Tolerance Limit (TLM)

State of Illinois Rules and Regulations Title 35:
Environmental Subtitle C: Water Pollution, Subpart B: General
Use Water Quality Standards Section 302.210

Standards for Effluent in State Waters

Title 35, Environmental Protection Act Subpart C, Water
Pollution 35 Illinois Administrative Code 304.102-.106-.141,
305.102-.103, 306.102.

Hazardous Waste Management

Title 35 Environmental Protection Act Subtitle G: Waste
Disposal:

35 IAC 700.101-.504,
35 IAC 702.101-.187,
35 IAC 703.101-.246,
35 IAC 705.121-.212,
35 IAC 720.101-.122,
35 IAC 721.101-.133,
35 IAC 722.110-.131,
35 IAC 724.101-.451,
35 IAC 724.101-.530,
35 IAC 726.120-.180.

BDAT Standards

RCRA Sections 304 (d) (3), (e) (3)

Particulate Criteria for Standards for Stationary Sources

Title 35, Environmental Protection Act Subtitle B, Air
Pollution Subchapter C, Emission Standards and Limitations
for Stationary Sources 35 Illinois Administrative Code
212.110, .321-.323, .361, .381, .422, .441, .456-.457,
.461-.463, .681.

Special Waste Hauling

Title 35 Environmental Protection Act Subtitle G. Waste
Disposal 35 Illinois Administrative Code 809.101-.802
(As in IEPA Bureau of Land Permit Section Review Comments).

On-Site Disposal

Title 35 Environmental Protection Act Subtitle G. Waste Disposal 35 IAC 811

Transportation of Hazardous Substances

Title 92, IAC, Transportation Subchapter C, Hazardous Materials 92 IAC 171.1-.317, 172.1000-.2215, 173.2000-.3000

Haulage Limitations on Roadways

Illinois Department of Transportation Director of Highways Section 15, Illinois Vehicle Code Based on Federal Bridge Formulas.

Noise Limitation for Motor Vehicles

Title 35, Environmental Protection Act. Subtitle H. Noise 35 IAC 902.101, .102, .120-.125, .140-.141

Emission Standards for Hazardous Air Pollutants

Title 35 Environmental Protection Act. Subtitle B Air Pollution 35 IAC 231.110, .122, .130, .140, .150, .180, .190, .200, .210, .230, .240, .250, .260, .320.

Fugitive Particulate Emission Standards

Title 35, Environmental Protection Act Subtitle B, Air Pollution 35 IAC 212.302, .304-.310, .312-.315, .110, .455

Organic Material Emission Standards

Title 35, Environmental Protection Act Subtitle B, Air Pollution 35 IAC 215.101-.102, .121-.122, .141-.144, .301-.304, .500, .541, .562.

Air Quality Standards

Title 35 Environmental Protection Act Subtitle B, Air Pollution 35 IAC 243.104-.108, .121-.126.